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District of Arizona

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CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
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REDACTED FOR
PUBLIC DISCLOSURE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

1. Alonzo Cecilio Chavez, and
(Counts 1-3)

2. Alex Nido Lopez,
(Counts 4 and 5)

Defendants.

No. CR-24-1976-PHX-JJT (DMF)

INDICTMENT

VIO: 18 U.S.C. §§ 922(a)(6) and
924(a)(2)
(Material False Statement During the
Purchase of a Firearm)
Counts 1 – 4

18 U.S.C. § 924(a)(1)(A)
(False Statement During the
Purchase of a Firearm)
Count 5

18 U.S.C. §§ 924(d) and 981,
21 U.S.C. §§ 853 and 881; and
28 U.S.C. § 2461(c)
(Forfeiture Allegation)

THE GRAND JURY CHARGES:

COUNTS 1-3

On or about the dates listed below, in the District of Arizona, Defendant ALONZO CECILIO CHAVEZ knowingly made false statements and representations in connection with the acquisition of a firearm to the businesses listed below, which were intended and likely to deceive the businesses as to a fact material to the lawfulness of a sale of a firearm by the business, each of which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44

of Title 18, United States Code, to be kept in the records of each listed business, in that Defendant ALONZO CECILIO CHAVEZ did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, in each of the counts below stating he was the actual buyer or transferee of the firearm, and was not buying the firearm on behalf of another person, whereas in truth and fact, Defendant ALONZO CECILIO CHAVEZ knew that he was buying the firearm on behalf of another person:

Count	Date	Business (FFL)
1	12/2/2023	Sprague's Sports (Yuma, AZ)
2	2/26/2024	Jones & Jones (Yuma, AZ)
3	3/11/2024	Firearms Unknown (Yuma, AZ)

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 4

On or about December 2, 2023, in the District of Arizona, Defendant ALEX NIDO LOPEZ knowingly made a false statement and representation in connection with the acquisition of a firearm to Sprague's Sports, which was intended and likely to deceive Sprague's Sports as to a fact material to the lawfulness of a sale of a firearm by Sprague's Sports, which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Sprague's Sports, in that Defendant ALEX NIDO LOPEZ did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating he was the actual buyer or transferee of the firearm, and was not buying the firearm on behalf of another person, whereas in truth and fact, Defendant ALEX NIDO LOPEZ knew that he was buying the firearm on behalf of another person.

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 5

On or about December 2, 2023, in the District of Arizona, Defendant ALEX NIDO

LOPEZ knowingly made a false statement and representation to Sprague's Sports, which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Sprague's Sports, in that Defendant ALEX NIDO LOPEZ did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating that Defendant ALEX NIDO LOPEZ resided at an address on Spring Street in Yuma, Arizona, whereas in truth and fact, Defendant ALEX NIDO LOPEZ knew that he resided at a different address.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

FORFEITURE ALLEGATION

The Grand Jury realleges and incorporates the allegations in Counts 1-5 of this Indictment, which are incorporated by reference as though fully set forth herein.

Pursuant to Title 18, United States Code, Sections 924(d) and 981, Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c), and upon conviction of the offenses alleged in Counts 1-5 of this Indictment, the defendants shall forfeit to the United States of America all right, title, and interest in (a) any property constituting, or derived from, any proceeds the persons obtained, directly or indirectly, as the result of the offense, and (b) any of the defendants' property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense as to which property the defendants are liable. If any forfeitable property, as a result of any act or omission of the defendants:

- (1) cannot be located upon the exercise of due diligence,
- (2) has been transferred or sold to, or deposited with, a third party,
- (3) has been placed beyond the jurisdiction of the court,
- (4) has been substantially diminished in value, or
- (5) has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of said defendants

1 up to the value of the above-described forfeitable property, pursuant to Title 21, United
2 States Code, Section 853(p).

3 All in accordance with Title 18, United States Code, Sections 924(d) and 981, Title
4 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section
5 2461(c), and Rule 32.2, Federal Rules of Criminal Procedure.

6 A TRUE BILL

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8 s/
FOREPERSON OF THE GRAND JURY
9 Date: December 3, 2024

10 GARY M. RESTAINO
11 United States Attorney
District of Arizona

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13 s/
PATRICK E. CHAPMAN
14 Assistant U.S. Attorney